

EXHIBIT G

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU**

SDN LIMITED and STEVEN NERAYOFF,

Plaintiffs,

v.

IOV LABS LIMITED, RIF LABS LIMITED, RSK
LABS LIMITED, DIEGO GUTIERREZ ZALDIVAR,
and ALEJANDRO MARIA ABERG COBO a/k/a ALEX
COBO,

Defendants.

Index No. 607805/2024

Motion Sequence No. 1

**AFFIRMATION OF JOHN PISKORA IN SUPPORT OF MOTION TO EXTEND
PLAINTIFFS' TIME TO COMPLETE SERVICE OF PROCESS**

JOHN A. PISKORA, an attorney duly admitted to practice law in the Courts of the State of New York, affirms as follows under penalties of perjury pursuant to CPLR 2106:

1. I am a partner of Loeb & Loeb LLP, attorneys for Plaintiffs SDN Limited and Steven Nerayoff in this action. I am fully familiar with the matters set forth herein, and respectfully submit this affirmation in support of Plaintiffs' motion, pursuant to CPLR 306-b, for the entry of an Order enlarging the time for Plaintiffs to complete service of process upon the foreign Defendants for an additional 120 days.

2. On May 3, 2024, Plaintiffs commenced this action for fraud, aiding-and-abetting fraud, and rescission arising from Defendants' material misrepresentations made in connection with the offering and sale of RIF tokens (a digital token). See [NYSCEF Doc. No. 1](#).

3. All Defendants in this action reside outside of the United States and are residents of Gibraltar (IOV Labs and RIF Labs), British Virgin Islands (RSK Labs), Argentina (Mr. Zaldivar), and Uruguay (Mr. Cobo). Apart from Defendant Cobo, service upon the remaining

Defendants must be made pursuant to the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters (the “Hague Convention”), or other conventional means pursuant to the CPLR.

4. The Hague Convention generally provides for service in signatory countries via a request for service made to that country’s Central Authority (“Formal Hague Convention Service”).

5. Signatory countries may also authorize direct service upon a Defendant by mail. In compliance with the Hague Convention, as applicable to Gibraltar, Plaintiffs served IOV Labs (f/k/a RIF Labs) and RSK Labs by mail on August 16, 2024.

6. Separately, on July 26, 2024, Plaintiffs served RSK Labs through Raul Laprida, an officer and/or director of the company. *See* [NYSCEF Doc. No. 2](#).


7. In addition to the foregoing, and for an abundance of caution in certain instances, Plaintiffs have also undertaken Formal Hague Convention Service via service requests to applicable Central Authorities with respect to the corporate Defendants and Defendant Zaldivar. More specifically, Plaintiffs have retained a process serving company that specializes in Formal Hague Service and sent completed USM-94 Requests for Service Abroad of Judicial or Extrajudicial Documents, with copies of the case initiation documents and any necessary translations, upon the central authorities for Gibraltar, the British Virgin Islands, and Argentina. Although these service documents were delivered to the applicable Central Authorities for these countries in July 2024, we have been informed that the completion of service by the Central Authorities and delivery of proof of service may take up to an additional 120 days. *See Exhibit 1*, a true and correct copy of the Affirmation of Maria J. Gutierrez dated August 21, 2024.

8. Finally, Defendant Cobo is, upon information and belief, a resident of Uruguay. Uruguay is not a signatory to the Hague Convention. Plaintiffs unsuccessfully

attempted to serve Mr. Cobo in Florida. *See Exhibit 2*, a true and correct copy of the Affidavit of Non-Service upon Mr. Cobo. Given the foregoing, Plaintiffs are undertaking to serve Mr. Cobo personally in Uruguay.

I affirm this 21st day of August, 2024, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

Dated: New York, New York
August 21, 2024


By: 
John A. Piskora (jpiskora@loeb.com)
Loeb & Loeb LLP
345 Park Avenue
New York, NY 10154
Tel: (212) 407-4000

*Attorneys for Plaintiffs
SDN Limited and Steven Nerayoff*

Certificate of Compliance with Rule 17 of 22 NYCRR § 202.70(g)

I hereby certify that the number of words in the foregoing affirmation, according to the word count on the word processing program utilized, exclusive of the caption, signature block and this certificate of compliance, is 585.

Dated: New York, New York
August 21, 2024

By: 
John A. Piskora